

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI**

**IN RE: Gregory LaGeorge Davis
Tinnie Yvette Davis, Debtors**

**Case No. 19-14472-JDW
CHAPTER 13**

**MOTION TO APPROVE SETTLEMENT
AND AUTHORIZE DISTRIBUTION OF PROCEEDS**

COMES NOW, Thomas C. Rollins, Jr., attorney for Morgan & Morgan (“Special Counsel”), and files this Motion to Approve Settlement and Authorize Distribution of Proceeds and in support thereof, would show to this Honorable Court as follows, to-wit:

1. This Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b).
2. On or about November 6, 2023, Morgan & Morgan was employed as Special Counsel (Dk# 54) representing Debtor in a personal injury claim. That Debtor and Special Counsel agreed to a contingency fee of 35% plus expenses.
3. The personal injury claim is now settled in the gross amount of \$20,000.00. The settlement is fair and in the best interest of the Debtor and the bankruptcy estate.
4. Special Counsel requests settlement approval and authority to pay the gross settlement proceeds of \$20,000.00 to the Chapter 13 Trustee who shall then disburse the claim proceeds as follows:
 - a. Attorney’s Fees (*subject to Court approval of Special Counsel’s Application for Compensation*) - \$7,000.00
 - b. Expenses: none (waived)
 - c. To Special Counsel the sum of \$8,527.33 for full satisfaction of the following medicals:
 - i. Polaris - \$1,657.60

- ii. Northstar - \$4,896.00
 - iii. Quitman Ambulance - \$766.00
 - iv. Delta ER - \$934.41
 - v. Delta ER Physician - \$273.32
- d. Amount to be retained by the Trustee for Distribution in Debtor's case pursuant to further order of this Court: \$4,472.67

WHEREFORE, the undersigned requests that this Motion be received and filed and that an Order be entered approving the foregoing settlement and distribution of proceeds, and prays for such other, further, and general relief to which the Special Counsel may be entitled.

Respectfully submitted,

Morgan & Morgan

BY: /s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr. (MSBN 103469)
Jennifer A Curry Calvillo (MSBN 104367)
The Rollins Law Firm, PLLC
P.O. Box 13767
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601-500-5533

CERTIFICATE OF SERVICE

I, Thomas C. Rollins, Jr., do hereby certify that a true and correct copy of the above and foregoing Motion to Approve a Settlement and Authorize Distribution of Proceeds with Debtor was forwarded on November 16, 2023 to:

By Electronic CM/ECF Notice:

Chapter 13 Case Trustee

U.S. Trustee

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr. (MSBN 103469)